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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

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14 DANIEL MOSSO RAMIREZ and
CHRISTOPHER NJINGU,

15 Petitioners-Plaintiffs,

16 v.

17 ROBERT CULLEY, Director of the Salt
18 Lake City Office of the U.S. Immigration and
Customs Enforcement, et al.,

19 Respondents-Defendants.
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Case No. 2:20-cv-609-JAD-VCF

STIPULATION
REGARDING PETITION FOR
HABEAS RELIEF AND MOTION
FOR TEMPORARY RESTRAINING
ORDER (## 1, 2)

ORDER

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23 Petitioners Ramirez and Njingu filed their petition (#1) seeking habeas relief and
24 their motion (#2) for temporary restraining order on March 31, 2020. The federal
25 defendants were served with the petition on April 2, 2020. Additionally, the Court issued
26 an order (#6) directing the respondents to file a response to the petition and the motion for
27 temporary restraining order within 3 days of the Court's order. Accordingly, the
28 respondents must respond by **Monday, April 6, 2020**. Based on the circumstances

described below, the parties stipulate and agree that the deadline for response shall be extended to **Tuesday, April 7, 2020**.

According to the petition, each petitioner is currently in immigration detention at the Henderson Detention Center in Henderson, Nevada. They each seek relief in the form of “their immediate relief from detention” based on the national health emergency related to the COVID-19 pandemic.

1. Petitioner Njingu was released on parole from ICE detention on April 2, 2020.

2. Petitioner Ramirez is scheduled to appear before an Immigration Judge on Monday, April 6, 2020 for a hearing on his Motion to Terminate and, depending on what transpires at the hearing, he may be released from custody.

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1 Accordingly, counsel for the Petitioners and all respondents hereby stipulate and agree that
2 respondents' answer and response be due on **Tuesday April 7, 2020.**

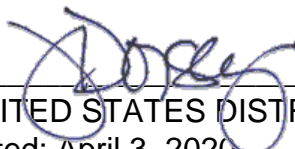
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4 NICHOLAS A. TRUTANICH
United States Attorney

5 /s/ Greg Addington
6 GREG ADDINGTON
7 TROY FLAKE
Assistant United States Attorneys
For Federal Respondents

/s/ Nicole C. Levy
NICOLE C. LEVY
American Civil Liberties Union of Nevada
For Petitioners

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10 /s/ Brian Reeve
BRIAN REEVE
11 City of Henderson, Nevada
For City of Henderson Respondents

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15 **IT IS SO ORDERED.**

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19 UNITED STATES DISTRICT JUDGE
Dated: April 3, 2020.